Case 16-18059-mdc Doc 40 Filed 06/29/17 Entered 06/29/17 12:41:38 Desc Main Document Page 1 of 2

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Steven L. Streeter, Jr.

Debtor

MIDFIRST BANK

Movant

vs.

No. 16-18059 MDC

Steven L. Streeter, Jr.

Debtor/Respondent

William C. Miller

Trustee/Respondent

11 U.S.C. Section 362

## **STIPULATION**

Trustee/Respondent

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by the Movant on the Debtor's residence is \$6,735.60, which breaks down as follows;

Post-Petition Payments:

December 2016 through April 2017 at \$1,097.04/month

Late Charges:

December 2016 through April 2017 at \$43.88/month

Fees & Costs Relating to Motion: \$1,031.00 Total Post-Petition Arrears \$6,735.60

- 2. The Debtor(s) have indicated that he is surrendering the property and does not intend to cure the said arrearage.
- 3. The Debtor(s) agree to the entry of an Order granting relief from the automatic stay in the form attached hereto.
- 4. The provisions of this stipulation do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.
  - 5. The parties agree that a facsimile signature shall be considered an original signature.

Date: June 5, 2017

By: /s/ Thomas I. Puleo, Esquire
Thomas I. Puleo, Esquire
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Attorneys for Movant

| Date: 66-17                                       | The same                       |
|---|--------------------------------|
|   | Scott F. Waterman, Esquire     |
|   | Attorney for Debtor            |
| Date: 6/15/17                                     | William C. Miller 100 Trechon  |
|   | Chapter 13 Trustge             |
|   | *without prejudice to any      |
|   | trustee rights or remedies     |
| Approved by the Court this day of                 | , 2017. However, the court     |
| retains discretion regarding entry of any further |                                |
|   |                                |
|   | •                              |
|   |                                |
|   | Magdeline D. Coleman           |
|   | United States Bankruptcy Judge |